

# ATTACHMENT 24

\*\*\* CONFIDENTIAL ATTORNEYS EYES ONLY \*\*\*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SURGICAL INSTRUMENT SERVICE )  
COMPANY, INC., ) Case No.:  
 ) 3:21-cv-03496-VC  
Plaintiff, )  
 ) Lead Case No.:  
vs. ) 3:21-cv-03825-VC  
 )  
INTUITIVE SURGICAL, INC., )  
 )  
Defendant )  
 )  
IN RE: DA VINCI SURGICAL ROBOT )  
ANTITRUST LITIGATION )  
 )  
THIS DOCUMENT RELATES TO: )  
ALL ACTIONS )  
 )

\*\*\* CONFIDENTIAL ATTORNEYS EYES ONLY \*\*\*

30(b)(6) DEPOSITION OF:

KEITH ROBERT JOHNSON

THURSDAY, OCTOBER 27, 2022

9:06 a.m. Mountain Standard Time

REPORTED BY:  
Vickie Blair  
CSR No. 8940, RPR-CRR  
JOB NO. 5539883  
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Deposition of KEITH ROBERT JOHNSON, the witness, taken  
on behalf of the Defendant, on Thursday,  
October 27, 2022, 9:06 a.m. Mountain Standard Time,  
before VICKIE BLAIR, CSR No. 8940, RPR-CRR.

APPEARANCES OF COUNSEL VIA ZOOM:

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8 ALSO PRESENT:

9 RAMON A. PERAZA, Videographer  
10  
11  
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25

1 components that are not found in traditional 09:36:22

2 laparoscopic instruments? 09:36:25

3 A From what aspect? 09:36:32

4 Q Any aspect. 09:36:34

5 A Well, I mean, the biggest one, like I 09:36:37

6 stated, is one is manually utilized with a surgeon's 09:36:41

7 hands, the other one is managed through a robot. 09:36:46

8 So, as far as size differences, a grasper 09:36:50

9 is a grasper, scissors are a scissor, monopolar, 09:36:56

10 bipolar, suction, for the most part, yes, they -- they 09:37:01

11 have the same functionality, but obviously are 09:37:07

12 manufactured differently just because of the fact that 09:37:12

13 one is used by a robot and one is held in a surgeon's 09:37:15

14 hand. 09:37:18

15 Q Are you familiar with the cables that 09:37:19

16 appear in Intuitive's EndoWrist instruments? 09:37:22

17 A Yes. 09:37:28

18 Q Do traditional laparoscopic instruments 09:37:28

19 have similar cables? 09:37:33

20 A No, they do not. 09:37:35

21 Q Does SIS have experience repairing or 09:37:43

22 inspecting laparoscopic instruments that contain 09:37:49

23 cables? 09:37:53

24 A No. 09:37:58

25 Q Prior to entering into the EndoWrist 09:37:59